



**Concerns and Questions Following 2/17/16 EPA Community Meeting
February 18, 2016**

The San Jacinto River Coalition sincerely appreciates the U.S. EPA directing the Potentially Responsible Parties (PRPs) to add additional safety measures for the San Jacinto River Waste Pits Superfund Site. As stated in the meeting, the PRPs do need to be held to higher standards and we look forward to the EPA ensuring that these new standards are met in order to ensure protection of human health and the environment.

I. Sampling and Monitoring

- a. What is the timeline for the newly required additional environmental sampling?
- b. Who will review the 24/7 surveillance material?
- c. How often will this surveillance material be reviewed?
- d. From speaking with others who have more experience with Superfund Sites, I am told that it is typical for EPA to require the PRPs to test all groundwater wells within a 1-mile radius of the Superfund Site. I understand that Harris County is using settlement funds to test groundwater wells in specific communities but not in Highlands/McNair/Channelview. The nearest groundwater wells in Highlands are just east of the Site on S. Main Street. A well sampled in private testing has shown detectable levels of the following dioxin congeners:
1,2,3,6,7,8-HxCDD. 1,2,3,7,8,9-HxCDD. 1,2,3,4,6,7,8-HpCDD. OCDD. 1,2,3,4,7,8-HxCDF. 1,2,3,6,7,8-HxCDF. 1,2,3,6,7,8-HxCDF. 1,2,3,7,8,9-HxCDF. 2,3,4,6,7,8-HxCDF. 2,3,4,6,7,8-HpCDF. 1,2,3,4,7,8,9-HpCDF. OCDF

Many of these congeners are listed in the U.S. EPA Region 6 CERCLA Docket No. 06-12-10 Administrative Settlement Agreement and Order on Consent between the U.S. EPA and International Paper Company and McGinnis Industrial Maintenance Corporation.

This is a true and serious matter and we *need* the EPA to require the PRPs to hire an independent third party to conduct additional groundwater testing. I may not be able to share all of the data at this point but that doesn't change the fact that we are finding dioxin in many wells north, south, east, and west of the Site. The Waste Pits are in a highly residential area and our communities need the EPA to require additional testing in order to gain a conclusive idea of what's out there and what measures need to be made to protect human health and our environment. We need your help.

II. Inspection Requirements

- a. What methods will the new underwater inspection requirements include?
Probing? Dive Teams?
- b. When will a dive team complete an underwater inspection of the cap in entirety?
Given that a 25' by 22' deficiency was discovered when only 14% of the cap was



inspected by a dive team, it is extremely concerning what else could be lurking under the River's surface.

III. December 2015 Cap Repair

- a. What was different in the December 2015 cap repair than in the 2011 TCRA that allowed placement of geotextile on the northwest portion of the cap?

IV. Request for U.S. Army Corps of Engineers' Cap Deficiency Investigation

- a. We respectfully request that the Corps investigate what risk are associated with the deficiency discovered in December of 2015. More specifically, what occurs when water enters the site and migrates/percolates through the Pits.

V. Community Meeting Frequency

- a. Quarterly community meetings were discussed by Sam Coleman. Seeing that the new requirements for underwater inspections are quarterly, perhaps the community meetings could follow the inspections to report findings and updates to local residents.

VI. Fish Tissue Testing

- a. We request that the U.S. EPA require the PRPs hire a third party to conduct additional fish tissue sampling for dioxin and PCBs. We request testing of the following fish and shellfish: Blue Crab, Sheephead, Spotted Seatrout, Sand Trout, Blue Catfish, Flathead Catfish, Hardhead Catfish, Red Drum, Striped Bass, Flounder, Black Drum, Oyster.
- b. If you look at Superfund Sites across the United States that are similar to the Waste Pits, the EPA has required removal of the highest concentrations of waste. There are 7 similar sites in terms of toxicity, geologic/hydrologic setting (tidally influenced waterway), fish consumption advisory, and contaminants of concern/contaminated mediums. Following remediation at some of these sites, fish consumption advisories were lifted. Texas Department of State Health services has stated that they do not have the resources to conduct fish tissue sampling.

Thank you for taking the time to consider the above questions and concerns. I look forward to relaying your response to the Coalition and community members.

Sincerely,

A handwritten signature in blue ink that reads 'Jackie Young'.

Jackie Young

Executive Director

San Jacinto River Coalition

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